

Program Integrity - Preliminary Review

Purpose:

This procedure describes the process for conducting a preliminary review.

Identification of Roles:

IME Program Integrity (PI) Unit– conduct preliminary review

Performance Standards:

Within 24 hours of receipt of the referral

Path of Business Procedure:

Conducting a Preliminary Review

Step 1. The Investigator, completes a preliminary review with input from the Account Manager, Supervisor, Operations Manager and the Database Management Administrator:

- a. to determine the most appropriate approach in addressing a referral or a proposed review focus;
- b. to further investigate a provider or treatment that appears to be aberrant or exceptional on a Surveillance & Utilization Review Services (SURS) Subsystem Report;
- c. to determine whether a potential problem exists to an extent that would warrant a full review; and
- d. to determine the size of an identified population of providers or claims to be reviewed.

Step 2. If an individual provider(s) has been identified for the review, the Account Manager or Operations Manager will enter the provider reviews into the PI Database as they are assigned.

Step 3. The Investigator initiates the following preliminary review process.

- a. Investigator accesses the PI database and adds a narrative in the notes section outlining the data request information to be pulled by the Database Management Administrator (DBMA).

- b. The Investigator sends an email to the Account Manager and DBMA informing them that there is a data request detailing the information needed for the review.
- c. The DBMA reviews the data request and pulls the information as described in the PI database notes section. Extracted data is formatted and saved to P:\Case Files\REVIEWS IN PROCESS\REVIEWER NAME\NAME OF REVIEW.
- d. After the data is obtained from the warehouse and formatted, the DBMA will email the Account Manager and Investigator indicating that the data is available and attaches a link to the data.

Step 4. The Investigator completes the preliminary review of the provider using SURS Subsystem, data query and MMIS claims review for analysis to determine if a full review is indicated.

Step 5. If the preliminary review indicates fraud or abuse, the issue is presented to the Account Manager. If the Account Manager agrees, the preliminary review is stopped and the provider is referred to MFCU for investigation. PI will not initiate a full review unless the issue is declined by MFCU.

Step 6. If the Account Manager determines a referral to MFCU is appropriate, the Investigator completes the Provider Notification form located at Program Integrity/Template-Provider Notification.

Step 7. The Investigator saves the document to the Referrals Pended Folder in the Program Integrity folder on the universal drive.

Step 8. The Investigator will present the Provider Notification form to MFCU at the next scheduled bi-weekly MFCU meeting. If the MFCU accepts the referral, the PI unit will follow the steps outlined in the PI procedure: Provider Payment Suspension Due to Credible Allegations of Fraud.

Step 9. If the referral is declined by the MFCU, it moves into a full review status. The Investigator along with the Database Management Administrator use the "Reviewer Project Recommendation and Project Initiation Form" PI F-102_1 (P: SURS/Templates and Forms/Approved Forms/SURS Review Forms/Reviewer Project Recommendation and Project Initiation form (PI)).

- a. Fills in all applicable fields on the form.
- b. Saves the recommendation form in the "Reviews in Process" folder (P: SURS/ Case Files/Reviews in Process/[Reviewer's Name]).

- c. Sends an e-mail stating the name and location/link of the completed “Review Recommendation and Project Initiation” form to the Contract Director.
- d. Does not move forward with recommended action (e.g., full review) until confirmation of approval is received from the Contract Director that the PI form is approved and complete.
- e. Discuss case closure recommendations with the Contract Director and Supervisor to obtain approval and have the form completed.

Step 7. If closure is approved by the Account Manager and Operations Manager, because the preliminary review does not support a full review, the following steps are needed.

- a. The Investigator sends the Account Manager an email outlining the rationale for closure. The Investigator also enters a narrative in the PI database notes section with the closure rationale.
- b. The Investigator prepares the paper file for the Administrative Assistant to send for scanning and shredding.
- c. The Investigator gives the paper file to the Account Manager or Operations Manager after they have finished preparing the file for closure.
- d. After the Account Manager or Operations Manager has received the paper file from the reviewer, the case is closed in the PI database by marking the appropriate fields.
- e. After closure, the Operations Manager or Investigator moves the folder from P:\Case Files\REVIEWS IN PROCESS\REVIEWER NAME\NAME OR REVIEW to P:\Case Files\REVIEWS IN PROCESS\REVIEWER NAME\CLOSED CASES.
- f. The Investigator gives the paper file to the Administrative Assistant for breakdown and delivery to scanning.
- g. An email is sent to the DBMA and the reviewer indicating that the case has been officially closed.

Step 8. The Account Manager along with the Operations Manager determines case dispensation according to urgency of case and determine priorities and dispensation.

Step 9. The Account Manager informs the DBMA, and Reviewer of any cases approved for full review by sending e-mail notification. The completed form remains in the Reviewer's Reviews in Process folder.

The Investigator and Database Management Administrator are responsible for ensuring that the project is approved and that the completed form is saved in the appropriate file before proceeding with the full review.

FORMS/REPORTS:

Reviewer Project Recommendation and Project Initiation Form PI F-102_1

RFP References:

6.5.3.1

Interfaces:

Other IME Units

Medicaid Fraud Control Unit

Attachments:

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